

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division  
In Admiralty**

In the Matter of COEYMANS MARINE  
TOWING, LLC D/B/A CARVER MARINE  
TOWING as Owner and Operator of M/T  
Mackenzie Rose, (IMO No. 8968765), *et al.*

**Civil Action No. 2:24-cv-00490-MSD-LRL**

**NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY AND  
EVANSTON INSURANCE COMPANY’S SECOND MOTION IN LIMINE TO  
EXCLUDE EXPERT OPINION AND EVIDENCE  
FROM SAM STEPHENSON, J.D.**

Norfolk and Portsmouth Belt Line Railroad Company (“Belt Line”) and Evanston Insurance Company (“Evanston”), by and through undersigned counsel, move this Court for an Order *in limine* excluding certain opinion testimony about credibility expected to be offered by Coeymans Marine Towing, LLC d/b/a Carver Marine Towing’s expert witness Sam Stephenson, J.D., along with any reference by him to a U.S. Coast Guard 2692 form, as such evidence is not admissible. The reasons for this motion are more fully set forth in the accompanying Memorandum in Support.

WHEREFORE, Belt Line and Evanston respectfully request that this Court enter an Order *in limine* excluding the credibility opinion testimony of Sam Stephenson, J.D., along with any reference by him to a U.S. Coast Guard 2692 form or any other Coast Guard investigative process.

Dated: September 23, 2025

NORFOLK AND PORTSMOUTH BELT  
LINE RAILROAD COMPANY

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of September 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all registered counsel of record, and mailed to:

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